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Anthony Marsh, WSBA #45194

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WASHINGTON

YUKI LEE, in her capacity as personal representative of the Estate of her deceased husband, JOOCHAN LEE, individually and Decedent's surviving wife, and in her capacity as Guardian of their minor daughter, A.L. both as beneficiaries and heirs of Decedent's estate,

Plaintiffs,

vs.

THE MOODY BIBLE INSTITUTE OF CHICAGO, and Illinois corporation,

Defendant.

No. 2:19-cv-00326-SAB

PLAINTIFF'S AMENDED RULE 26(a)(2) DISCLOSURE OF EXPERT TESTIMONY

TO: DEFENDANT AND THEIR ATTORNEYS OF RECORD:

Plaintiff Yuki Lee (hereinafter "Plaintiff"), by and through her attorneys, *HERRMANN LAW GROUP*, pursuant to and in the manner required by Rule 26(a)(2) of the Federal Rules of Civil Procedure hereby discloses the identity of those persons who may be used at trial to present evidence under Rules 702, 703, and/or 705 of the Federal Rules of Evidence as follows:

PLAINTIFF'S RULE 26(A)(2) DISCLOSURE OF EXPERT TESTIMONY - 1

1. Dr. Barbara C. Luna, 15490 Ventura Blvd #300, Sherman Oaks, CA 91403. (818) 981-4226.

A true and correct copy of Dr. Luna's written reports pertaining to the Estate of Joochan Lee containing a complete statement of Dr. Luna's opinions, the reasons for them, and a list of the facts and data considered by her in forming her opinions is attached hereto as **Exhibit A**.

A true and correct copy of Dr. Luna's curriculum vitae listing her qualifications, as well as a listing of the cases in which she has testified as an expert at trial or by deposition within the preceding four years, Dr. Luna's fee schedule, and a list of all publications Dr. Luna has published is attached hereto as **Exhibit B**.

2. Peter R. Leffe, P.O. Box 1331, Venice, California 90294. (310) 346-1116.

A true and correct copy of Mr. Leffe's written report pertaining to the subject air crash of this lawsuit, containing a complete statement of Mr. Leffe's opinions, the reasons for them, and a list of the facts and data considered by him in forming his opinions is attached hereto as **Exhibit C**.

A true and correct copy of Mr. Leffe's curriculum vitae listing his qualifications, as well as a listing of the cases in which he has testified as an expert at trial or by deposition within the preceding four years, Mr. Leffe's fee schedule, and a list publications Mr. Leffe has published is attached hereto as **Exhibit D**.

3. Artemas K. (Kit) Darby III, 1029 Peachtree City, GA 30269. (877) 334-2939.

A true and correct copy of Mr. Darby's written report pertaining to Decedent, containing a complete statement of Mr. Darby's opinions, the reasons for them, and a list of the facts and data considered by him in forming his opinions is attached hereto as **Exhibit E**.

A true and correct copy of Mr. Darby's curriculum vitae listing his qualifications, as well as a listing of the cases in which he has testified as an expert at trial or by deposition within the preceding four years, Mr. Darby's fee schedule, and a list of all publications Mr. Darby has published is attached hereto as **Exhibit F**.

4. Voyko Banjac, Ph.D., 330 "A" Street, Ste 170, San Diego, CA 92101. (760) 822-5882.

A true and correct copy of Dr. Banjac's written report pertaining to subject air crash of this lawsuit, containing a complete statement of Dr. Banjac's opinions, the reasons for them, and a list of the facts and data considered by him in forming his opinions is attached hereto as **Exhibit G**.

A true and correct copy of Dr. Banjac's curriculum vitae listing his qualifications, as well as a listing of the cases in which he has testified as an expert at trial or by deposition within the preceding four years, Dr. Banjac's fee schedule, and a list of all publications Dr. Banjac has published is attached hereto as **Exhibit H.**

DATED this 7th Day of September, 2021.

HERRMANN LAW GROUP

/s/ Anthony Marsh

Anthony R. Marsh, WSBA No. 45194 Attorney for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Herrmann Law Group and a person of such age and discretion as to be competent to serve papers.

I further certify that on today's date, I electronically filed the Plaintiff's Disclosure of Expert Witnesses with Exhibits A - H, using the CM/ECF system which will send notification of such filing to CM/ECF participant(s):

Christopher J Raistrick	craistrick@amm-law.com
-	

klaurent@amm-law.com

Michael G McQuillen <u>mmcquillen@amm-law.com</u>

Nicholas Ajello <u>najello@amm-law.com</u>

nick.ajello@gmail.com

William C Schroeder wcs@ksblit.legal

<u>alunden@ksblit.legal</u> <u>mhernandez@ksblit.legal</u>

I further certify that on this date, I uploaded the Plaintiff's Disclosure of Expert Witnesses, including Exhibits A – H, to Defendant's attorneys of record, using the electronic file transfer system, OneDrive. Any recipient in receipt of the link is able to access OneDrive and download any documents that the Plaintiff has uploaded.

Dated this 7th day of September, 2021.

/s/ Anthony Marsh

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PLAINTIFF'S RULE 26(A)(2) DISCLOSURE OF EXPERT TESTIMONY - 1